

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HAYMOUNT URGENT CARE PC,  
ROBERT A. CLINTON, JR.,  
INDIGO INSTALLATIONS, INC., and  
CHRISTOPHER A. TURRENTINE, individually,  
and on behalf of all those similarly situated,

Plaintiffs.

v.

GOFUND ADVANCE, LLC,  
FUNDING 123, LLC,  
MERCHANT CAPITAL LLC,  
ALPHA RECOVERY PARTNERS, LLC,  
YITZCHOK (“ISAAC”) WOLF,  
JOSEF BREZEL,  
JOSEPH KROEN, and  
YISROEL C. GETTER,

Defendants.

Case No. 1:22-cv-01245-JSR

**NOTICE OF MOTION FOR  
CERTIFICATION PURSUANT TO  
28 U.S.C. § 1292(b)**

**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law, dated August 3, 2022, and upon all papers and proceedings herein, Defendants, GoFund Advance, LLC, Funding 123, LLC, Merchant Capital LLC, Alpha Recovery Partners, LLC, Yitzchok Wolf, Yosef Brezel, Joseph Kroen, and Yisroel C. Getter, hereby moves this Court, before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, NY 10007, for an order (i) certifying its Order for immediate appeal pursuant to 28 U.S.C. § 1292(b); and (ii) stay discovery pending the resolution of this Motion and the appeal.

Dated: August 3, 2022  
New York, N.Y.

/s/ Edward Normand  
Edward Normand  
Velvel (Devin) Freedman  
Kyle W. Roche

Peter Bach-y-Rita  
Richard Cipolla  
Kelvin Goode  
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